#### IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

DONNA CURLING, ET AL., Plaintiffs,

v.

BRAD RAFFENSPERGER, ET AL., Defendants.

Civil Action No. 1:17-CV-2989-AT

# PLAINTIFFS' JOINT NOTICE OF FILING OF RESPONSE IN OPPOSITION TO STATE DEFENDANTS' MOTION TO STAY PROCEEDINGS

As the Court directed during the March 11, 2022 teleconference, ECF No. 1341, Plaintiffs hereby notify the Court of their short letter response with citations to case law in support of Curling Plaintiffs' opposition and Coalition Plaintiffs' conditional opposition to the imposition of a stay of all proceedings in this Court "pending a decision of the Eleventh Circuit in the appeals from this Court's 2020 Preliminary Injunction Orders, Appeal Nos. 20-13730 and 20-14067" requested by State Defendants on March 4, 2022. ECF No. 1327 at 1. Coalition Plaintiffs' counsel's response to the Court, submitted to chambers this same day, is attached to this Joint Notice as Exhibit 1.

#### Respectfully submitted, this 15th day of March, 2022.

/s/ David D. Cross /s/ Adam M. Sparks David D. Cross (pro hac vice) Halsey G. Knapp, Jr. Mary G. Kaiser (pro hac vice) GA Bar No. 425320 Veronica Ascarrunz (pro hac vice) Adam M. Sparks Hannah R. Elson (pro hac vice) GA Bar No. 341578 Zachary Fuchs (pro hac vice) KREVOLIN & HORST, LLC MORRISON & FOERSTER LLP 1201 West Peachtree Street, NW 2100 L Street, NW, Suite 900 **Suite 3250** Atlanta, GA 30309 Washington, DC 20037 (202) 887-1500 (404) 888-9700

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/s/ Robert A. McGuire, III

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(ECF No. 125)

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### /s/ Cary Ichter

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> Counsel for Plaintiffs William Digges III, Laura Digges, Ricardo Davis & Megan Missett

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## **CERTIFICATE OF COMPLIANCE**

Pursuant to LR 7.1(D), I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ Adam M. Sparks
Adam M. Sparks

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#### **CERTIFICATE OF SERVICE**

I hereby certify that on March 15, 2022, a copy of the foregoing PLAINTIFFS' JOINT NOTICE OF FILING OF RESPONSE IN OPPOSITION TO STATE DEFENDANTS' MOTION TO STAY PROCEEDINGS was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record.

/s/ Adam M. Sparks
Adam M. Sparks